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Association for Local Telecommunications Services

Federal Communications Commission  
Office of Secretary

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July 10, 1998

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M St., N.W.  
Washington, D.C. 20054

Re: (1) Application of Ameritech Michigan Pursuant to Section 271 of the Communications Act of 1934, as amended, To Provide In-Region, InterLATA Services in Michigan, CC Docket No. 97-137;  
(2) Performance Measurements and Reporting Requirements for Operations Support Systems, Interconnection, and Operator Services and Directory Assistance; CC Docket No. 98-56 9101;  
(3) Implementation of the Local Competition Provisions in the Telecommunications Act of 1996; CC Docket No. 96-98.

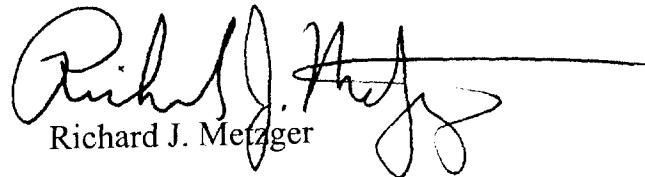
Dear Ms. Salas:

On June 24, 1998, Robert Taylor, President of Focal, and Renee Martin, General Counsel of Focal, along with myself on behalf of ALTS, met with the members of the Commission staff listed below to discuss Focal's operations in Chicago. In the course of that conversation, Focal was asked to provide quantitative information concerning the extent it is forced to provision interconnection trunking above the 50/50 split provided for in its interconnection agreement with Ameritech. This information is appended as Attachment A. I also made the point that ALTS has a petition for reconsideration pending in CC Docket No. 96-98 asking the Commission to recognize that requesting carriers have a right to bona fide negotiations concerning incident-based performance requirements and penalties concerning such issues as interconnection trunking.

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Focal was also asked whether it prefers the interconnection trunking performance measurements proposed in the Department of Justice's March 8th letter to SBC to the measurements proposed in the QSS NPRM. As indicated in ALTS' recent reply comments, the DOJ proposal currently appears to be the better measurement for this parameter. This letter is being filed as an ex parte in the above dockets.

Sincerely yours,



Richard J. Metzger

cc:     J. Fabian  
         N. Fried  
         G. Johnson  
         R. Karmarkar  
         M. Nagler  
         S. Newman  
         R. Pepper  
         J. Wilkins

ENDOFFICE NAME	CLLI CODE	TRUNKS-FOCAL	TRUNKS-AIT
ALGONQUIN	ALGNILAQDS0	48	24
ANTIOCH	ANTCILACDS0	48	0
ARLINGTON HTS DS1	ARLHILAHDS1	96	0
AURORA "AE"	AURRILAEDS0	120	48
AURORA "AR"	AURRILARDS0	96	48
AUSTIN CG0	CHCGILAUCG0	48	0
BARRINGTON	BNTOILBADSO	48	24
BARTLETT	BRTLILBTDS0	96	48
BELLWOOD CG0	BLWDILBWCG0	48	0
BEVERLY CG0	CHCGILBECG0	72	0
BLUE ISLAND	BLISILBIDS0	96	24
BOLINGBROOK	BGBKILBKDS0	24	0
CALUMET CITY DS0	CMCYILCCDS0	48	0
CALUMET CITY DS1	CMCYILCCDS1	24	0
CANAL DS3	CHCGILCLDS3	48	24
CARY	CARYILCADSO	48	0
CHICAGO HEIGHTS	CHHGILCHDS0	48	0
CICERO CG0	CICRILCICG0	48	0
CRYSTAL LAKE	CRLKILCKDS0	120	24
DEERFIELD	DRFDIILDFDS0	72	24
DES PLAINES DS0	DSPLILXLDS0	24	0
DES PLAINES DS1	DSPLILXLDS1	72	24
DORCHESTER	CHCGILDODSO	72	24
DOWNERS GROVE DS0	DWGVILDGDS0	72	24
DOWNERS GROVE DS1	DWGVILDGDS1	24	0
EAST CHICAGO HTS	ECHGILEHDS0	24	0
EDgewater CG0	CHCGILEDCG0	144	0
ELGIN	ELGNILELDS0	120	72
ELK GROVE DS0	EGVGILEGDS0	24	0
ELK GROVE DS1	EGVGILEGDS1	96	48
ELMHURST	EMHRILETDS0	72	24
EVANSTON	EVTNILEVDS0	144	96
FOX LAKE	FXLKILFKDS0	48	0
FRANKFORT	FRFTILFBDS0	24	0
FRANKLIN DS3	CHCGILFRDS3	48	24
FRANKLIN DS4	CHCGILFRDS4	48	0
FRANKLIN DS6	CHCGILFRDS6	48	24

GENEVA	GENVILGNDS0	96	24	
HARVEY	HRVYILHADS0	48	24	
HIGHLAND PARK	HGPKILHPDS0	24	0	
HINSDALE	HNDLILHIDS0	96	48	
HOFFMAN ESTATES	HFESILWLDS1	168	96	
HOMEWOOD	HMWDILHODS0	72	24	
HUMBOLDT CG0	CHCGILHBCG0	72	0	
IRVING	CHCGILIRDS0	96	72	
JOLIET DS0	JOLTILJWDS0	48	24	
JOLIET DS1	JOLTILJWDS1	48	0	
KANKAKEE	KNKKILKKDS1	96	24	
KILDARE CG0	CHCGILKICG0	24	0	
LAFAYETTE	CHCGILLADS0	48	24	
LAKE FOREST	LKFRILLFDS0	72	24	
LAKE ZURICH	LKZRILLZDS0	72	24	
LAKEVIEW CG0	CHCGILLWCG0	96	0	
LAKEVIEW DS0	CHCGILLWDS0	168	120	
LASALLE	LSLLILLSDS0	192	0	
LIBERTYVILLE	LBVLILLIDS0	240	120	
LOMBARD	LBRDILLMDS0	96	48	
MCHENRY	MCHNILMYDS0	72	24	
MERRIMAC	CHCGILMEDS0	96	48	
MONROE DS0	CHCGILMODS0	48	0	
MONROE DS1	CHCGILMODS1	48	24	
MORTON GROVE	MRGVILMGDS0	72	24	
NAPERVILLE	NPVLILNADS0	168	72	
NEW LENOX	NWLNILNLDS0	24	0	
NEWCASTLE	CHCGILNEDS0	96	48	
NORTH CHICAGO	NCHCILNCDS0	24	0	
NORTHBROOK	NBRKILNBDS0	96	48	
OAK LAWN	OKLWILOLDS0	144	48	
OAK PARK CG0	OKPKILOPCG1	72	0	
OAKLAND CG0	CHCGILOKCG0	48	0	
ORLAND PARK	ORPKILOLDS0	96	24	
OTTOWA	OTWAILOTDS0	144	48	
PALOS PARK	PLPKILPPDS0	48	0	
PARK FOREST	PKFSILPFDS0	72	24	
PARK RIDGE DS0	PRRGILXLDS0	24	0	

PLAINFIELD	PLFDILPLDS0	48	24	
PROSPECT CG0	CHCGILPRCG0	72	0	
PULLMAN CG0	CHCGILPUCG0	72	0	
RIVERDALE	RVDLILRDDS0	48	0	
ROGERS PARK CG0	CHCGILRPCG0	96	0	
ROSELLE	RSLLILRZDS0	120	96	
ROUND LAKE	RNLKILRLDS0	48	0	
SCHAUMBURG	SCBGILCODS0	24	0	
SKOKIE	SKOKILSKDS0	144	96	
SOUTH CHICAGO CG0	CHCGILSCCG0	96	0	
STEWART CG0	CHCGILSTCG0	72	0	
STEWART DS0	CHCGILSTDSD0	24	0	
SUPERIOR DS0	CHCGILSUDS0	48	24	
SUPERIOR DS2	CHCGILSUDS2	72	48	
TINLEY PARK	TNPKILTPDS0	120	72	
WABASH DS0	CHCGILWBDS0	24	0	
WAUCONDA	WCNDILWUDS0	24	0	
WAUKEGAN	WKGNILWKDS0	120	48	
WEST CHICAGO	WCHCILWCDS0	24	0	
WHEATON	WHTNILWHDS0	120	96	
WILMETTE	WLMTILWIDS0	48	0	
WOODSTOCK	WDSTILWSDS0	96	0	
ZION	ZIONILZNDS0	24	0	
ARLINGTON HTS DS0	ARLHAHDS0	24	24	
BENSENVILLE	BNSVILBVDS0	24	24	
DEARBORN	CHCGILIDDS0	72	72	
EAST DUNDEE	EDNDILDUDS0	48	48	
FRANKLIN DS0	CHCGILFRDS0	72	72	
GLEN ELLYN	GLELILGEDS0	24	24	
GLEN VIEW	GLVILGVDS0	48	48	
GRAYS LAKE	GLYLKILGLDS0	48	48	
HICKORY HILLS	HCHLILHDS0	48	48	
LAGRANGE	LGRCILLGDS0	48	48	
LAKE VILLA	LKVILLKDS0	24	24	
LEMONT	LEMTILLNDS0	24	24	
PALATINE	PALTILPADS0	120	120	
PARK RIDGE DS1	PRRGILXLDS1	24	24	
PORTSMOUTH	CHCGILPMDS0	48	48	

SUMMIT	SMMTILSMDS0	24	24	
SUPERIOR DS1	CHCGILSUDS1	48	48	
WABASH DS3	CHCGILWBDS3	48	48	
WHEELING	WLNGILWGDS0	120	120	
WINNETKA	WNTKILWNDS0	24	24	
 Total End Office		8208	3240	
 LAGRANGE	TANDEM	360	240	
NEWCASTLE	TANDEM	360	240	
WABASH	TANDEM	1128	888	
NORTHBROOK	TANDEM	360	240	
STEWART	TANDEM	96	0	
 Total Tandem		2304	1608	
 Percentage Total Trunks Carried by Focal **		68.4%		
Percentage of End Office Trunks/Total Trunks		74.5%		
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\*\* This percentage expected to increase to approximately 73% by September 1st based upon orders already issued and lack of Ameritech fiber optic facilities.